



April 5, 2017

Mr. Don Gallo
Husch Blackwell
20800 Swenson Drive, Suite 300
Waukesha, WI 53186-2058

SUBJECT: Waste Determination
Bay Towel – Solvent Investigation, 501 Adams Street, Green Bay, Wisconsin
DNR BRRTS # 02-05-237064

Dear Mr. Gallo:

On April 5, 2017, the Department of Natural Resources (DNR) received *Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request (Form 4400-237)* and the associated \$700.00 review fee. This submittal was prepared by Fehr Graham and submitted to the DNR on behalf of Bay Towel.

This waste determination is based upon the above referenced submittal and previously submitted reports and analytical data for the Bay Towel – Solvent Investigation site. This letter serves as your notification that chlorinated solvent contaminated soil from Areas I, K and Q associated with the above reference Bay Towel - Solvent site can be handled/disposed of as non-hazardous waste due to the fact that:

- it does not exhibit a hazardous characteristic,
- it meets the land disposal restrictions of less than 60 milligrams/kilogram (mg/kg) for tetrachloroethylene (PCE), trichloroethylene (TCE) and vinyl chloride (VC), and
- it meets the contained-out values for PCE (153 mg/kg), TCE (8.8 mg/kg) and VC (2 mg/kg) as outlined in the DNR publication titled "*Contained-Out Values for PCE, TCE and Vinyl Chloride, December 2013, Pub-RR-969.*"

If you have any questions regarding the content of this letter, please contact me in Green Bay at 920-662-5443.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Kristin DuFresne'.

Kristin DuFresne
Hydrogeologist
Bureau for Remediation & Redevelopment

ec: John Butz, Bay Towel
Ken Ebbott, Fehr Graham